REMARKS

Claims 17-30 are pending. Upon entry of this amendment, claims 17, 23, 29 and 30 are amended.

Claims 17-30 stand rejected under 35 USC §103(a) as being unpatentable over Wan in view of Hunter.

Wan discloses that decoding occurs "on the fly" as it is received ([0038]). In order to accomplish this, Wan discloses that the decoder examines the encoded XML document to identify an encoding format associated with each data type forming part of the XML document, and decodes each part using a decoder complementing the encoding format with which the corresponding data type was encoded (see claim 15; [0056]). In order to more efficiently decode the document, Wan separates the text from the structure:

> In general, the volume of structural information is much smaller than that
> of textual content. Structures are usually nested and repeated within a
> document instance. Separating structure from text allows any repeating
> patterns to be more readily identified by the compression algorithm which,
> typically, examines the input stream through a fixed-size window. In
> addition, the structure and the text streams have rather different
> characteristics. Hence, different and more efficient encoding methods may
> be applied to each of the structure and text [0046]

Therefore, Applicant submits that "mixed models" could not be implemented in Wan given the critical separation of text from the structure. The Hunter reference does not provide any teachings directed to such a configuration.

Additionally, further support that show that no provisions in Wan deal with complex data types or mixed content models can seen in FIG. 1 (also illustrated in FIG. 9), wherein the XML document (104) and the tree representation (102) can only support values that are directly connected to the elements (e.g., "Basketball" and <TD> 1.1, "Soccer" and <TD> 1.2, etc.)). Indeed, *Wan* discloses that "[t]he structure is critical in providing the context for interpreting the text." since structure and text in an encoder allows the corresponding decoder to parse the structure of the document more quickly by processing only the relevant elements while ignoring elements (and descendants) that it does not know or require ([0047]).

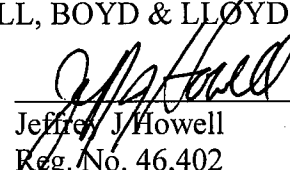Therefore, Applicant submits that independent claim 17 and its dependent claims are allowable.

Independent claims 23, 29 and 30 and their respective dependent claims are allowable for similar reasons.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing.

Respectfully submitted,

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